

**REMARKS**

Reconsideration and allowance of the subject application are respectfully requested. Claims 1-6, 8-27, 29, 30, 32, 33, 35-37, and 39-46 are now pending. Claims 1, 20, 22-25, 27, 30, and 33 are independent claims.

**Allowable Subject Matter**

Applicants appreciate the Examiner's indication that claims 30 and 33 are allowable and that claims 28, 29, 31, 32, 38, and 39 would be allowable if rewritten in independent form to include the limitations of their base claim and any intervening claims.

In this Reply, Applicants have amended independent claim 1 to include the features of allowable claim 28 (now canceled). Therefore, claim 1, and all claims depending therefrom, should now be indicated as allowable. Independent claim 20 has been amended similar to claim 1. In view of this amendment, claim 20, as well as all claims depending therefrom, should now be indicated as allowable.

Independent claim 22 has been amended to include the features of allowable dependent claim 31 (now canceled). Therefore, claim 22, as well as claims depending therefrom, should now be indicated as allowable.

Independent claim 25 has been amended to include the features of dependent claim 34 (now canceled) and to specify aspects of the position-coding pattern consistent with those features recited in

the above-listed dependent claims that have been deemed by the Examiner to constitute allowable subject matter. Therefore, claim 25, as well as claims depending therefrom, should now be indicated as allowable.

Claim 27 has been amended to include the features of allowable dependent claim 38 (now canceled). Therefore, claim 27, as well as claims depending therefrom, should now be indicated as allowable.

For at least the reasons set forth below, Applicants respectfully request that all remaining pending claims also be indicated as allowable.

#### **Prior Art Rejections**

1. Yamada - Sekendur

Claims 1-6, 8-10, 12-14, 16-18, 20, 22-25, 27, and 34-37 stand rejected under 35 U.S.C. § 103 as allegedly being unpatentable over Yamada (U.S. Patent 5,927,872) in view of Sekendur (U.S. Patent 5,852,434). This rejection, insofar as it pertains to the presently-pending claims, is respectfully traversed.

Initially, Applicants submit that the rejection of claims 1-6, 8-10, 12-14, 16-18, 20, 22, 25, 27, and 34-37 has been rendered moot by the amendments presented and discussed above. Furthermore, for reasons set forth below, the asserted grounds of rejection fails to establish *prima facie* obviousness of any of the remaining rejected claims.

Independent claim 23 is directed to an apparatus for printing graphical information on a surface. The apparatus of claim 23 comprises: a nozzle for dispensing dye on the surface; an image sensor for recording an image of the surface, wherein the recorded image contains a position-coding pattern that codes an absolute position on the surface; and a processor for converting the recorded image into a recorded absolute position, wherein the processor determines a predicted position of the nozzle based on the recorded absolute position, wherein the nozzle dispenses dye on the surface when the predicted position corresponds to a graphics position in the graphical information.

Independent claim 24 is directed to an apparatus for printing graphical information on a surface. The apparatus of claim 24 comprises: a print head for printing indicia on the surface; an image sensor for recording an image of the surface, wherein the recorded image contains a position-coding pattern that codes an absolute position on the surface; and a processor for converting the recorded image into a recorded absolute position, wherein the processor determines a predicted position of the print head based on the recorded absolute position, wherein the print head prints the indicia on the surface when the predicted position corresponds to a graphics position in the graphical information.

In rejecting independent claims 23 and 24, the Examiner cites col. 9, lines 39-63 of *Yamada*, supposedly as teaching the claimed

feature of determining a predicted position of the print head (or nozzle) based on the recorded absolute position. Neither this section of *Yamada*, nor the remainder of the reference, however, teaches or suggests determining a predicted position of a print head or nozzle based on a recorded absolute position. *Yamada* discloses a system and a method for printing information. The printer 10 described by *Yamada* is hand-held and, as illustrated for example in Fig. 4, includes a plurality of navigation sensors 30 to track movement of the printer 10 relative to a print medium during a printing process. As illustrated in Fig. 5 (discussed at col. 5, line 59 - col. 6, line 40), the hand-held printer 10 of *Yamada* compares successively generated images to determine relative position. By comparing images of the surface to be printed, captured at different times, the movement of the hand-held printer 10 can be determined. The hand-held printer 10 of *Yamada* starts to print in a position where it is initiated to start printing. When the printer 10 is moved over the surface, it determines its position based on a comparison of a captured image with a previously captured image and a previously determined position. This movement tracking, using relative positioning, is not based on determining predicted position in the manner recited in claims 23 and 24.

The secondary reference, *Sekendur*, fails to make up for this deficiency of *Yamada*. Therefore, the asserted combination of *Yamada*

and *Sekendur* (assuming these references may be combined, which Applicants do not admit) fails to establish *prima facie* obviousness of claims 23 or 24, or any claim depending therefrom.

In view of the above, Applicants respectfully request reconsideration and withdrawal of the Examiner's rejection based on the asserted combination of *Yamada* and *Sekendur*.

2. *Yamada - Sekendur - Sato*

Claims 11, 21, and 26 stand rejected under 35 U.S.C. § 103 as allegedly being unpatentable over *Yamada* in view of *Sekendur* and further in view of *Sato et al.* (U.S. Patent 4,851,921). This rejection, insofar as it pertains to the presently-pending claims, is respectfully traversed.

Claims 11, 21, and 26 depend, respectively, from independent claims 1, 20, and 25. In view of the amendments to their respective base claims presented and discussed above, Applicants respectfully submit that the grounds of rejection based on the asserted combination of *Yamada*, *Sekendur*, and *Sato* (assuming these references may be combined, which Applicants do not admit) has been rendered moot. Accordingly, Applicants respectfully request that the rejection be reconsidered and withdrawn.

3. Yamada - Sekendur - Montgomery

Claim 15 stands rejected under 35 U.S.C. § 103 as allegedly being unpatentable over Yamada in view of Sekendur and further in view of Montgomery et al. (U.S. Patent 4,797,544). This rejection, insofar as it pertains to the presently-pending claims, is respectfully traversed.

Claim 15 depends from claim 1. Therefore, in view of the amendments to claim 1 presented and discussed above, Applicants respectfully submit that the rejection based on the asserted combination of Yamada, Sekendur, and Montgomery (assuming these references may be combined, which Applicants do not admit) has been rendered moot. Accordingly, Applicants respectfully request that the rejection be reconsidered and withdrawn.

4. Yamada - Sekendur - Poole

Claim 19 stands rejected under 35 U.S.C. § 103 as allegedly being unpatentable over Yamada in view of Sekendur and further in view of Poole (U.S. Patent 5,816,718). This rejection, insofar as it pertains to the presently-pending claims, is respectfully traversed.

Claim 19 depends from claim 1. Therefore, in view of the amendments to claim 1 presented and discussed above, Applicants respectfully submit that the rejection based on the asserted combination of Yamada, Sekendur, and Poole (assuming these

references may be combined, which Applicants do not admit) has been rendered moot. Accordingly, Applicants respectfully request that the rejection be reconsidered and withdrawn.

Conclusion

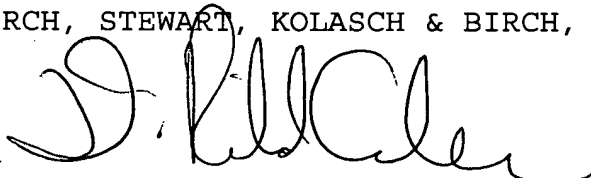
Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact the undersigned at the telephone number below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Respectfully submitted,

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